



July 1, 2010

Velda Griffin
Executive Director
Option House, Inc.
PO Box 970
San Bernardino, Ca 92402

SUBJECT: Performance Assessment Report
GRANT #: DV09061488 & DR09061488
RECIPIENT NAME: Option House, Inc.

Dear Ms. Griffin,

Thank you again for your time on June 29, 2010, when I conducted a Performance Assessment of the Domestic Violence Assistance (DV) Program grant for your agency. Attached please find a copy of the Performance Assessment including the Domestic Violence Recovery Act (DR) Addendum.

During the site visit, we discussed Cal EMA's requirements for the project, the goals and objectives of the program, the project's source documentation, and the reporting requirements. As a result of the visit, I have identified the following areas which need corrective action.

California Environmental Quality Act (CEQA)

Finding: Current CEQA documentation was not on file.

Citation: Recipient Handbook Section 2153 requires all Cal EMA funded projects to certify compliance with CEQA. A copy of the CEQA compliance memo or other certification must be completed once during the project's grant award cycle. The original copy must be retained on file for review during site and monitoring visits by Cal EMA staff.

Corrective Action: The project must obtain verification of compliance with CEQA or otherwise exemption from CEQA and submit copy to Cal EMA by **January 1, 2011**.

Comment: Contact your city or county planning department to have them prepare an environmental document stating whether the project will have a significant effect on the environment.

Client Confidentiality

Current Policy: No written policy exists for the handling, safekeeping, and eventual destruction of files, nor does a policy specifically identify the time period long term files should be kept.

Citation: Both the Victims Of Crime Act and the Family Violence Prevention Act contain provisions protecting the confidentiality of victims. Specifically, 42 U.S.C. 10402 (a)(2)(E) authorizes the state to ensure documented procedures have been developed and implemented (to include policies and procedures) "to assure the confidentiality of records pertaining to any

individual provided family violence prevention or treatment services by any program assisted under this chapter...”

Recommendation: While documented protocols exist up until the point of long-storage, no protocol exists for the handling of client files during or after that period. Written protocols should be established for the long-term storage of and eventual destruction of client files, in order to protect against the dissemination of confidential client information. Evidence of the development of a written policy should be submitted to Cal EMA no later than **January 1, 2011**.

EEO Policy

Finding: The project does not distribute the written EEO policy to clients or volunteers.

Citation: See Recipient Handbook Section 2151.7.

Corrective Action: Personnel responsible for EEO compliance should contact the Cal EMA EEO Compliance Officer at (916) 845-8454 for additional information on specific state and federal civil rights laws to ensure compliance. Additionally, the project should post a copy of all EEO Policies in a public forum. Evidence steps have been taken to inform clients should be provided to Cal EMA no later than **January 1, 2010**.

Written Policies for Responding to Emergency Medical Personnel

Finding: The project lacks written policies for responding to Emergency Medical Personnel.

Citation: The 2009/2010 RFA (Part II, Section A, subsection “b”, number “iv”) indicates agencies must provide written protocol for how they will provide 24 hour emergency response to law enforcement and medical personnel.

Corrective Action: The project should develop written policies that document their response to Emergency Medical Personnel and Law Enforcement Personnel. Evidence of the completion of said policy should be submitted to Cal EMA no later than **January 1, 2011**.

Fidelity Bond

Finding: The Fidelity Bond information the current grant number.

Citation: Recipient Handbook, Fidelity Bond, Section 2160, requires recipients to obtain a fidelity bond or an equivalent employee dishonesty insurance contract in an amount equal to 50 percent of the total grant award, less matching funds. Section 2161.2 indicates the Fidelity Bond must include Form A, Employee Dishonesty, and Form B, Forgery Coverage. The Fidelity Bond must provide blanket coverage of all employees; a scheduled bond is not acceptable. Further, Section 2161.4 states the certificate holder or first loss payee must be the State of California, Emergency Management Agency. The grant numbers for each grant covered must be included.

Corrective Action: See Recipient Handbook Section 2160, Certificate of Insurance, for the components that must be included in the certificate. Documentation from an insurance carrier that verifies the grant recipient is in compliance with this requirement must be submitted to Cal EMA by **January 1, 2011**.

Proof of Authority

Finding: The project has written authorization from the board. However, this authorization was last made in 2002, for the 02/03 grant year.

Citation: The Recipient Handbook Section 1350 states, "All recipients, except for State Agencies, are required to obtain written authorization from the city council/ governing board that the official executing the agreement is, in fact, authorized to do so (e.g. a Resolution, pertinent Minutes, or a letter from the Board Chair). Recipients must maintain this written authorization on file and make it available on demand."

Corrective Action: The Executive Director will need to go before the board and obtain written authorization giving the Executive Director permission to conduct business including the authority to apply for and execute policy related to the Grant Award Agreement with Cal EMA. This resolution should be sought annually, prior to the beginning of the new grant year (fiscal year). A copy of this resolution should be submitted to Cal EMA no later than **January 1, 2011**.

As for the other documentation that you were required to provide at the time of the site visit, I will be placing copies in your DV09/10 file and your master file at Cal EMA headquarters.

Enclosed is a copy of the completed Site Visit Checklist Form for your review. Please sign the cover page and return a copy of the page to me by **Monday, August 2, 2010 or sooner** as confirmation of receipt.

Thank you again for your hospitality during this visit. If you have any questions regarding the site visit please contact me at 916.324.9104 or Jason.Stalder@calema.ca.gov.

Jason Stalder
Criminal Justice Specialist
Domestic Violence Section

Enclosures

C: Cal EMA R&R Logistics